

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**CREDIT CARD FRAUD CONTROL  
CORPORATION,  
Plaintiff,**

**vs.**

**MAXMIND, INC.,  
Defendant.**

§  
§  
§  
§  
§  
§  
§  
§

**CASE NO. 3:14-CV-03262-M**

**JOINT MOTION FOR STAY PENDING INSTITUTED  
COVERED BUSINESS METHOD PATENT REVIEW**

Defendant MaxMind, Inc. (“MaxMind”) and Plaintiff Credit Card Fraud Control Corporation (“CCFCC”) (jointly the “Parties”) respectfully move the Court to stay this case in light of Covered Business Method Patent Review (“CBM”) CBM2015-00094, which was instituted by the Patent Trial and Appeal Board (“PTAB”) of the United States Patent and Trademark Office (“USPTO”) on September 11, 2015. MaxMind filed an opposed motion to stay in favor of the CBM on March 11, 2015. (*See* Dkt. No. 17). By Order dated April 24, 2014, the Court denied the motion without prejudice to refile if the PTAB instituted the CBM. (Dkt. No. 29). The CBM has now been instituted as to all patent claims (claims 1-30) of U.S. Patent No. 8,630,942, the only patent asserted in this case. (Appx. 016). In light of the PTAB instituting the CBM, the Parties agree staying the case to allow the CBM proceeding to conclude will conserve judicial resources and is in the best interest of both Parties. As set forth above, the Parties respectfully request that the Court enter an order staying this cause until the resolution of CBM2015-00094.

Dated: September 14, 2015

Respectfully submitted,

**ANDREWS KURTH LLP**

By: /s/ Tonya M. Gray  
Anthony Son  
[AnthonySon@andrewskurth.com](mailto:AnthonySon@andrewskurth.com)  
1350 I Street, NW  
Suite 1100  
Washington, DC 20005  
Telephone: (202) 662-2784  
Facsimile: (202) 974-9524

Tonya M. Gray  
Texas Bar No. 24012726  
[tonyagray@andrewskurth.com](mailto:tonyagray@andrewskurth.com)  
1717 Main Street, Suite 3700  
Dallas, Texas 75201  
Telephone: (214) 659-4400  
Facsimile: (214) 659-4401

**ATTORNEYS FOR DEFENDANT  
MAXMIND, INC.**

/s/ Anthony Vecchione with permission

Edward R. Nelson, III

Texas State Bar No. 00797142

[ed@nelbum.com](mailto:ed@nelbum.com)

Ryan P. Griffin

Texas State Bar No. 24053687

[ryan@nelbum.com](mailto:ryan@nelbum.com)

Anthony Vecchione

Texas State Bar No. 24061270

[anthony@nelbum.com](mailto:anthony@nelbum.com)

Stacie Greskowiak McNulty

Texas State Bar No. 24074311

[stacie@nelbum.com](mailto:stacie@nelbum.com)

**NELSON BUMGARDNER P.C.**

3131 West 7th Street, Suite 300

Fort Worth, Texas 76107

Phone: (817) 377-9111

Fax: (817) 377-3485

**ATTORNEYS FOR PLAINTIFF CREDIT CARD  
FRAUD CONTROL CORPORATION**

**CERTIFICATE OF CONFERENCE**

Counsel for Defendant conferred with counsel for Plaintiff regarding this motion to stay on September 11, 2015. The relief requested herein is agreed to by the Parties.

/s/ Tonya M. Gray

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 14, 2015, the foregoing document was electronically submitted with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. The electronic case files system sent a "Notice of Electronic Filing" to all counsel of record.

/s/ Tonya M. Gray